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May 8, 2024


By ECF

Honorable Ronnie Abrams  
U.S. District Judge  
Southern District of New York  
40 Foley Square  
New York, N.Y. 10007

Application granted.

SO ORDERED.

**Re: United States v. Angela Rodriguez  
20 Cr. 39 (RA)**

  
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Ronnie Abrams, U.S.D.J.  
May 8, 2024

Dear Judge Abrams,

Ms. Rodriguez entered into a deferred prosecution agreement with the Government on or about December 21, 2023. One of the conditions of the agreement is that Ms. Rodriguez shall not leave the Southern or Eastern Districts without the prior approval of Pretrial Services. PSO Shawn Bostic has approved Ms. Rodriguez's request to take a Mother's Day trip with her daughter to the Bahamas from May 10, 2024, to May 13, 2024. However, Pretrial Services currently has Ms. Rodriguez's passport as a condition of her original bail. Accordingly, the defense writes now to respectfully request that Pretrial Services return the passport to Ms. Rodriguez forthwith and that she not be required to return it thereafter.

I have spoken to Officer Bostick who consents to this request. However, given the short notice, I have not yet been able to obtain the position of AUSA Samuel Rothchild (although AUSA Rothchild typically defers to the judgment of Pretrial Services on these types of requests). Accordingly, in the first instance, the defense respectfully requests that Ms. Rodriguez be allowed to retrieve her passport from Pretrial Services on or before May 10, 2024 in order to travel. However, if the Government objects to allowing Ms. Rodriguez to retain her passport while the Deferred Prosecution Agreement is in effect, she will return the passport to Pretrial Services immediately upon her return.

Thank you.

Respectfully submitted,

/s/ Matthew J. Kluger  
Matthew J. Kluger, Esq.  
*Attorney for Angela Rodriguez*

cc: AUSA Samuel P. Rothschild  
PTSO Dayshawn Bostic